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Hearing Date and Time:
October 12, 2017 at 10:00 a.m. (Eastern Time)

Deadline to Respond:
October 5, 2017 at 4 p.m. (Eastern Time)

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LM Realty 27D, LLC; LM Realty 24C, LLC;
LM Realty 23H, LLC; LM Realty 20A, LLC;
LM Realty 18 West, LLC; LM Realty 10C, LLC;
LM Property Management LLC; The Larisa Markus
Revocable Trust; The Lamar Foundation;
Protax Services Inc., Protax Services Consulting, Inc.;
Ilya Bykov; First Integrated Construction, Inc.; and
Innovative Construction Group, Inc.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

**FOREIGN ECONOMIC
INDUSTRIAL BANK LIMITED,
“VNESHPROMBANK” LTD.,**

Chapter 15

Case No. 16-13534 (MKV)

Debtor in a Foreign Proceeding.
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NOTICE OF AMENDED MOTION OF LM REALTY 31B, LLC; LM REALTY 27D, LLC; LM REALTY 24C, LLC; LM REALTY 23H, LLC; LM REALTY 20A, LLC; LM REALTY 18 WEST, LLC; LM REALTY 10C, LLC; LM PROPERTY MANAGEMENT LLC; THE LARISA MARKUS REVOCABLE TRUST; PROTAX SERVICES INC.; PROTAX SERVICES CONSULTING, INC.; ILYA BYKOV; FIRST INTEGRATED CONSTRUCTION, INC.; AND INNOVATIVE CONSTRUCTION GROUP, INC. FOR ENTRY OF AN ORDER PURSUANT TO RULE 9016 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE QUASHING THE SUBPOENAS ISSUED BY THE FOREIGN REPRESENTATIVE

PLEASE TAKE NOTICE that, on September 28, 2017, LM Realty 31B, LLC, LM Realty 27D, LLC, LM Realty 24C, LLC, LM Realty 23H, LLC, LM Realty 20A, LLC, LM Realty 18 West, LLC, LM Realty 10C, LLC, LM Property Management LLC , The Larisa Markus Revocable Trust, Protax Services Inc. a/k/a Protax Services Corp., Protax Services Consulting, Inc., Ilya Bykov, First Integrated Construction, Inc. and Innovative Construction Group, Inc (collectively, the “Movants”) filed the *Motion Of LM Realty 31B, LLC; LM Realty 27D, LLC; LM Realty 24c, Llc; Lm Realty 23h, Llc; Lm Realty 20a, Llc; Lm Realty 18 West, Llc; Lm Realty 10c, Llc; Lm Property Management Llc; The Larisa Markus Revocable Trust; Protax Services Inc.; Protax Services Consulting, Inc.; Ilya Bykov; First Integrated Construction, Inc.; And Innovative Construction Group, Inc. For Entry Of An Order Pursuant To Rule 9016 Of The Federal Rules Of Bankruptcy Procedure Quashing The Subpoenas Issued By The Foreign Representative* in connection with the above-captioned matter, with a hearing date of **October 12, 2017 at 10:00 a.m.** (prevailing Eastern Time) and an **Objection Deadline of October 5, 2017 at 4 p.m.** (prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that, the Movants hereby files an Amended Motion, annexed hereto as **Exhibit A** and a marked version of the Amended Motion indicating the changes to the original Motion, annexed hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that the Hearing Date and the Objection Deadline remain the same.

Dated: New York, New York
October 4, 2017

Respectfully submitted,

/s/ Gregory G. Plotko
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-and-

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Markus Revocable Trust, Protax Services Inc.
a/k/a Protax Services Corp., Protax Services
Consulting, Inc., Ilya Bykov, First Integrated
Construction, Inc. and Innovative
Construction Group, Inc.*